UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
REGION 28

**CYNTHIA THOMAS** 

Case No. 28-CA-186022

and

MGM GRAND HOTEL, LLC D/B/A MGM GRAND HOTEL AND CASINO

MGM GRAND HOTEL, LLC D/B/A MGM GRAND HOTEL AND CASINO'S
MOTION TO RESCHEDULE HEARING

Respondent MGM Grand Hotel, LLC d/b/a MGM Grand Hotel and Casino (hereinafter referred to as "Respondent" or "MGM Grand"), by and through its attorneys, Jackson Lewis P.C., pursuant to Section 102.16 of the Board's Rules and Regulations, moves to postpone the January 15, 2019 hearing that has been set in Case 28-CA-186022, and requests that the case be set for hearing to begin on February 12, 2019, or an appropriate date thereafter.

There is good cause for granting this request because counsel for Respondent is currently scheduled for another Board hearing on January 14, 2019 at 9:00 a.m. in a complex consolidated matter in Cases 28-CA-195968, 28-CA-201123, and 28-CA-216888. There is no alternative counsel that can attend the hearing in this matter.

Counsel for the General Counsel does not oppose the request. Rescheduling the hearing will not prejudice any party. Temporary delay will not impair the effectiveness of the traditional remedies invoked for the allegations contained in the Complaint.

For the foregoing reasons, Respondent respectfully request that the hearing in this matter be rescheduled for February 12, 2019, or an appropriate date thereafter.

Dated: November 16, 2018

Respectfully submitted, JACKSON LEWIS P.C.

/s/ Paul T. Trimmer

Paul T. Trimmer 3800 Howard Hughes Parkway, Suite 600 Las Vegas, Nevada 89169 (702) 921-2460

Counsel for Respondent MGM GRAND Hotel, LLC d/b/a MGM Grand Hotel and Casino

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## **CERTIFICATE OF SERVICE**

In addition to filing this **Motion to Reschedule Hearing** in the above captioned matter with Region 28 via the NLRB's electronic filing system, we hereby certify that copies have been served this 16th day of November, 2018, by First Class Mail, upon:

Mr. Cornele A. Overstreet Regional Director National Labor Relations Board Region 28 2600 N. Central Avenue, Suite 1400 Phoenix, Arizona 85004-3019

/s/ Emily Santiago
Emily Santiago